



February 28, 2018

BY ELECTRONIC FILING

Hon. Claire C. Cecchi, U.S.D.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *National Union Fire Insurance Company of Pittsburgh, Pa. v. Becton, Dickinson and Company*
Case No. 2:14-cv-04318-CCC-JBC

Anthony Bartell
Partner
T. 973-639-2062
F. 973-297-3846
abartell@mccarter.com

Dear Judge Cecchi:

We represent defendant Becton, Dickinson and Company ("BD"), and we write regarding plaintiff National Union Fire Insurance Company of Pittsburgh, Pa.'s ("National Union") appeal (ECF No. 138) of Magistrate Judge Clark's January 30, 2018 Opinion and Order (ECF No. 133). BD respectfully requests, pursuant to Local Rule 7.1(d), an adjournment of the return date of plaintiff's appeal from March 19, 2018 to April 2, 2018. Plaintiff graciously consents to BD's request. If Your Honor grants our request, then BD will file its opposition papers on or before March 19, 2018, and National Union will file its reply papers on or before March 26, 2018.¹

We appreciate Your Honor's attention to this matter, and we enclose a proposed form of Order for Your Honor's consideration. If Your Honor has any questions, please do not hesitate to contact us.

BOSTON

HARTFORD

STAMFORD

NEW YORK

NEWARK

EAST BRUNSWICK

PHILADELPHIA

WILMINGTON

WASHINGTON, DC

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Anthony Bartell".

Anthony Bartell

Enclosure

cc: Mark D. Sheridan, Esq.(by ECF)
Mark C. Errico, Esq. (by ECF)

¹ BD stands ready to file its opposition papers before March 19, 2018 to give National Union additional time to draft its reply. The parties will meet and confer on this briefing schedule issue.